REMARKS/ARGUMENTS

The Applicants have carefully considered this application in connection with the Examiner's Action and respectfully request reconsideration of this application in view of the foregoing amendment and the following remarks.

The Applicants originally submitted Claims 1-37 in the application. The Applicants previously amended Claims 19, 25 and 31. Presently, the Applicants have amended Claims 1 and 10. Accordingly, Claims 1-37 are currently pending in the application.

I. Rejection of Claims 1, 3-7, 10, 12-16, 19-31 and 33-36 under 35 U.S.C. §103

The Examiner has rejected Claims 1, 3-7, 10, 12-16, 19-36 and 33-36 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,815,709 to Waldo, *et al.* ("Waldo") in view of U.S. Patent No. 5,615, 400 to Cowsar *et al.* ("Cowsar"). As the Examiner is no doubt aware, determination of obviousness requires consideration of the invention considered as a whole; the inquiry is not whether each element exists in the prior art, but whether the prior art made obvious the invention as a whole. Furthermore, there must be some suggestion or teaching in the art that would motivate one of ordinary skill in the art to arrive at the claimed invention.

Moreover, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations.

The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on Applicants' disclosure.

The Examiner has stated that Waldo teaches an interface (interface 41), a check code generator (new fingerprint generator) an interface identifier (fingerprint identifiers) an interface verifier (verifier 20) and a compatibility (comparator 33, predetermined fixed number). (Examiner's Action, Page 2). The Examiner cited passages in Waldo, but mistakenly listed Cowsar for these passages. The Examiner also stated that Waldo does not explicitly use the term "a dynamically linkable component." The Examiner further stated that Cowsar teaches the term dynamic linking system. (Examiner's Action, Page 2). The Examiner then concluded that it would have been obvious to apply the teaching of Cowsar to Waldo in order to provide shared libraries for communication link identified between applications. (Examiner's Action, Page 2). The Applicants respectfully disagree.

The Applicants respectfully submit that the Examiner is merely listing elements in Waldo and Cowsar to establish obviousness. Waldo does not teach or suggest, among other things, a system or method of validating an interface of a dynamically linkable component that includes transforming the interface of the dynamically linkable component into an interface identifier representing the interface as recited in Claims 1 and 10. Nor does Waldo teach or suggest transforming as defined in the Applicants' Application. The term "transform" means a process in which adequate interface information is employed in creating an interface identifier such that alpha errors are eliminated and beta errors are substantially avoided. (Applicants' Application, Page 6, lines 1-12). Waldo merely teaches creating fingerprints for uniquely identifying object types for objects that are used in processing object-oriented programs. (Column 4, lines 27-30, and Column 6, lines 15-16). Waldo

also teaches that a fingerprint is generated based on the structure and content of the actual object, which includes the referenced object identifiers 40, the interfaces 41, the fields 42 and the method & procedures 43. (Column 5, lines 56-57, and FIG 2).

In addition, Waldo teaches sorting the interface names, the fields and the methods prior to using them in generating the object fingerprint value. Waldo states the reason for sorting is to ensure that the interface names, the fields and the methods will be in the same order to ensure the same fingerprint value will be generated. (Column 9, lines 44-52, Column 10, lines 9-20, and lines 48-57). This type of sorting done by Waldo would teach way from preventing alpha errors in interface information. For example, as the Examiner is no doubt aware, an interface of a dynamically linkable component includes parameters that are in a certain order. If the order of the parameters is changed, another program calling the dynamically linkable component using the old order would have undeterminable results and may even cause the processing to stop. This type of error could be classified as an Alpha error. To overcome this problem, among others, the Applicants' claimed invention employs an interface identifier that would account for the order of the parameters and allows for the determination of incompatibility of the interfaces before the dynamically linkable component is called. (Claims 1, 10, 19, 25 and 31). In contrast, by Waldo requiring that the interface names, the fields and methods always be sorted to ensure in the same order every time, Waldo would be unable to determine if the parameters or fields were arranged differently. This would cause an Alpha error. Therefore, Waldo teaches away from the Applicants' claimed invention as recited in Claims 1, 10, 19, 25 and 31.

The Examiner has also stated that Waldo teaches an interface verifier (verifier 20). (Examiner's Action, Pages, 2, 3, 4 and 5). The Applicants respectfully disagree. Waldo does not

teach or suggest, among other things, an interface verifier that employs the interface identifier to determine a compatibility of the interface of the dynamically linkable component as recited in Claims 1, 19 and 31. Nor does Waldo teach or suggest a method that includes employing the interface identifier to determine a compatibility of the interface of the dynamically linkable component as recited in Claims 10 and 25. Waldo merely states the term "verifier 20." (Column 6, line 40). The text associated with the term "verifier 20" merely states that for the object store 43, the fingerprint value generator 31 will look in the object fingerprint table 32 to see if it previously generated an object fingerprint value for a referenced object. If there is no previously generated object fingerprint value, the fingerprint generator 20 will generate an object fingerprint value for that object currently in the object store 34. (Column 6, lines 50-61). The Applicants are unable to find where Waldo employs the fingerprint value to determine the compatibility of the interface for a component. Waldo merely uses its fingerprint value to indicate that an object, such as object 22(m), is of a particular type and can be reconstructed. (Column 11, lines 20-24). Therefore, Waldo fails to provide the requisite motivation to develop the Applicants' claimed invention as recited in Claims 1, 10, 19, 25 and 31.

In addition, the Examiner has cited Cowsar merely for the premise of teaching the term dynamic linking system. As established in the previous response, Cowsar fails to teach or suggest the Applicants' claimed invention as recited in Claims 1, 10, 19, 25 and 31. Since Cowsar is merely cited for the term dynamic linking system and Cowsar fails to cure the deficiencies of Waldo, the Examiner cannot establish a *prima facie* case of obviousness with respect to Waldo and Cowsar.

Waldo, individually or in combination with Cowsar, fails to teach or suggest the invention recited in independent Claims 1, 10, 19, 25 and 31 and their dependent claims, when considered as a whole. Claims 1, 3-7, 10, 12-16, 19-31 and 33-36 are therefore not obvious in view of Cowsar.

In view of the foregoing remarks, the cited reference does not support the Examiner's rejection of Claims 1, 3-7, 10, 12-16, 19-31 and 33-36 under 35 U.S.C. §103(a). The Applicants therefore respectfully request the Examiner withdraw the rejection.

II.   Rejection of Claims 8, 17 and 37 under 35 U.S.C. §103

The Examiner has rejected Claims 8, 17 and 37 under 35 U.S.C. §103(a) as being unpatentable over Waldo in view of U.S. Patent No. 5,991,774 to Tate *et al.* ("Tate"). The Examiner stated that Waldo does not teach a check sum and a cyclic redundancy check. (Examiner's Action, Page 6). The Examiner cited Tate only for the premise of teaching a check sum and a cyclic redundancy check. (Examiner's Action, Page 6). The Examiner then concluded that it would have been obvious to apply the teachings of Tate to Waldo in order to provide verification of installed software at an installation, provide protection of files against viruses, tampering, or corruption, and provide an identification of the exact version of the installed software on any computer. (Examiner's Action, Page 6). The Applicants respectfully disagree.

As discussed above, Waldo fails to teach or suggest all of the elements of the inventions recited in Independent Claims 1, 10, 19, 25 and 31. The Examiner has cited Tate only for the premise of teaching a check sum and a cyclic redundancy check. (Examiner's Action, Page 6). Since Waldo fails to teach or suggest all of the elements of the inventions of Claims 1, 10, 19, 25 and 31, as explained above, and Tate fails to cure the deficiencies of Waldo, the Examiner cannot

establish a *prima facie* case of obviousness of dependent Claims 8, 17 and 37, which include the elements of the respective independent claims. The Applicants therefore respectfully traverse the Examiner's rejection of Claims 8, 17 and 37 under 35 U.S.C. §103.

III.   Rejection of Claims 2, 11 and 32 under 35 U.S.C. §103

The Examiner has rejected Claims 2, 11 and 32 under 35 U.S.C. §103(a) as being unpatentable over Waldo in view of U.S. Patent No. 5,548,759 to Ralph A. Lipe. The Examiner has stated that Waldo does not each a textual . . . portion of said interface. (Examiner's Action, Page 6). The Examiner has cited Lipe only for the premise of teaching a text file. (Examiner's Action, Page 6). The Examiner then concluded that it would have been obvious to apply the teaching of Lipe to Waldo in order to make the generator transform interface more available to use for any file system formats. (Examiner's Action, Page 7). The Applicants respectfully disagree.

As discussed above, Waldo fails to teach or suggest all of the elements of the inventions recited in Independent Claims 1, 10, 19, 25 and 31. The Examiner has cited Lipe only for the premise of teaching a text file. (Examiner's Action, Page 6). Since Waldo fails to teach or suggest all of the elements of the inventions of Claims 1, 10, 19, 25 and 31, as explained above, and Lipe fails to cure the deficiencies of Waldo, the Examiner cannot establish a *prima facie* case of obviousness of dependent Claims 2, 11 and 32, which include the elements of the respective independent claims. The Applicants therefore respectfully traverse the Examiner's rejection of Claims 2, 11 and 32 under 35 U.S.C. §103.

IV. Rejection of Claims 9 and 18 under 35 U.S.C. §103

The Examiner has rejected Claims 9 and 18 under 35 U.S.C. §103(a) as being unpatentable over Waldo in view of U.S. Patent No. 6,505,160 to Levy, *et al.* ("Levy"). The Examiner has stated that Waldo does not explicitly teach filtering. (Examiner's Action, Page 7). The Examiner has cited Levy only for the premise of teaching a filtered version. (Examiner's Action, Page 7). The Examiner then concluded that it would have been obvious to apply the teaching of Levy to Waldo in order to select a portion of a file to create a file ID. (Examiner's Action, Page 7). The Applicants respectfully disagree.

As discussed above, Waldo fails to teach or suggest all of the elements of the inventions recited in Independent Claims 1, 10, 19, 25 and 31. The Examiner has cited Levy only for the premise of teaching a filtered version. (Examiner's Action, Page 7). Since Waldo fails to teach or suggest all of the elements of the inventions of Claims 1, 10, 19, 25 and 31, as explained above, and Levy fails to cure the deficiencies of Waldo, the Examiner cannot establish a *prima facie* case of obviousness of dependent Claims 9 and 18, which include the elements of the respective independent claims. The Applicants therefore respectfully traverse the Examiner's rejection of Claims 9 and 18 under 35 U.S.C. §103.
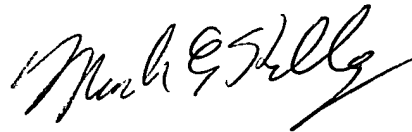
V. Conclusion

In view of the foregoing amendment and remarks, the Applicants now see all of the Claims currently pending in this application to be in condition for allowance and therefore earnestly solicit a Notice of Allowance for Claims 1-37.

The Applicants request the Examiner to telephone the undersigned attorney of record at (972) 480-8800 if such would further or expedite the prosecution of the present application.

Respectfully submitted,

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